

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE:

SHERRY L EUELL-GREENE AKA SHERRY  
GREENE, AKA S L EUELL GREENE, AKA  
SHERRY L. EUELL GREENE AKA SHERRY E  
GREENE

Debtor.

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Hearing Date: February 13, 2025

Hearing time: 09:30 a.m.

Case No.: 24-74633-ast

Chapter 13

Judge: Alan S. Trust

**AMENDED OBJECTION TO CONFIRMATION**

Ehret Anne Van Horn, Esq., an attorney duly admitted to practice before the United States Bankruptcy Court for the Eastern District of New York, states the following under the penalty of perjury:

1. I am an attorney at law duly licensed to practice before this Court and an associate with the office of Gross Polowy LLC, attorneys for Nationstar Mortgage LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for the RMAC Trust, Series 2016-CTT ("Secured Creditor"), and as such, am fully familiar with the facts and circumstances of the present case.

2. Secured Creditor is the holder of a note secured by a mortgage on real property commonly known as 230 Archer Street, Freeport, NY 11520 which property is owned by the Debtor.

3. The Debtor filed a Chapter 13 Plan on December 6, 2024 which lists arrears in the amount of \$510,000.00.

4. Secured Creditor will file a Proof of Claim listing approximately \$767,061.40 in pre-petition arrears.

5. The Debtor's proposed Chapter 13 Plan provides for post-petition payments in the amount of \$3,900.00, however the correct post-petition payment amount is \$5,105.38.

6. Additionally, the Debtor's proposed Chapter 13 Plan provides for total plan payments in the amount of \$600,000.00, which is insufficient to fully pay the arrears owed to Secured Creditor. Accordingly, the Debtor's proposed Plan is not feasible.

7. As the Debtor's proposed plan fails to provide for full payment of the arrears listed in the Proof of Claim to be filed by Secured Creditor and lists the incorrect post-petition payment amount and fails to provide for sufficient funds to be paid into the Plan, confirmation of the Plan must be denied pursuant to 11 U.S.C. § 1325.

WHEREFORE, it is respectfully requested that this Court deny confirmation of the Debtor's proposed plan, and for such other and further relief as to this Court deems just and equitable.

/s/ Ehret Van Horn  
Ehret Anne Van Horn, Esq.